

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHERYL SATTERTHWAITE, AS
EXECUTRIX OF THE ESTATE OF
DENNIS SATTERTHWAITE,

Plaintiff

v.

UNITED STATES OF AMERICA, UHS
OF WESTWOOD PEMBROKE, INC.,
ARTHUR N. PAPAS, M.D. AND
CATHERINE SULLIVAN, R.N.C.,

Defendants

NO. 05-10606-WGY

**OPPOSITION OF THE PLAINTIFF TO DEFENDANTS, CATHERINE SULLIVAN,
R.N.C, AND UHS OF WESTWOOD PEMBROKE, INC.'S MOTION TO OBTAIN
COURT ORDERS TO OBTAIN RECORDS FROM THE INTERNAL REVENUE
SERVICE AND THE UNITED STATES POSTAL SERVICE**

The plaintiff, Sheryl Satterthwaite, as Executrix of the Estate of Dennis Satterthwaite, hereby opposes the defendants, Catherine Sullivan, R.N.C. and UHS of Westwood Pembroke, Inc.'s (collectively the "Defendants") motion to obtain a court order requiring the defendant, United States of America, to produce records from the Internal Revenue Service and the United States Postal Service. In support of her opposition, the plaintiff relies upon her Memorandum in Support of her Opposition to the Motion of the Defendants, Catherine Sullivan, R.N.C. and UHS of Westwood Pembroke, Inc.'s Motion to Obtain records from the Internal Revenue Service and the United States Postal Service with attached exhibits.

Should this Court determine that any of the records should be produced, the plaintiff requests that the order be limited to such records in the following manner:

1. Any and all correspondence between Dennis Satterthwaite and the IRS regarding unpaid taxes, penalties and late fees for the year 2002;
2. Any and all records from the United Postal Service regarding Dennis Satterthwaite's work attendance from May 23, 2002 through May 30, 2002;
3. Any and all records from the United Postal Service regarding any discipline and/or warnings Dennis Satterthwaite received from May 23, 2002 through May 30, 2002; and
4. Any and all records from the United Postal Service regarding Dennis Satterthwaite's treatment with the United Postal Service Employee Assistance Program from May 23, 2002 through May 30, 2002.

PLAINTIFF,

By her attorneys,

SUGARMAN AND SUGARMAN, P.C.

Dated: February 28, 2007

/s/ David P. McCormack
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Certificate of Service

I hereby certify that a true copy of the above document was served by regular mail, postage prepaid, on February 28, 2007 upon the attorney of record for each party:

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